

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

JESSICA DOUGHTY, on behalf of the	)	
ESTATE OF ANDREW JACKSON,	)	
DECEASED, et al.,	)	
	)	
Plaintiffs,	)	Case No. CIV-17-1218-M
	)	
v.	)	
	)	
CITY OF CHICKASHA, et al.,	)	
	)	
Defendants.	)	

**JOINT MOTION FOR PROTECTIVE ORDER**

The parties respectfully request that this Court enter the Agreed Protective Order which is submitted to this Court via email. In support of this Motion, the parties show the Court as follows:

1. The parties stipulated to begin discovery on January 2, 2018, in advance of the Rule 26(f) Conference and the Status Conference.
2. Certain documents and information have been requested in this case which the parties believe to be confidential, including the Oklahoma State Bureau of Investigation Report
3. The parties have agreed to protect against the disclosure of certain information to certain persons outside of this case though the proposed Agreed Protective Order.

Thus considering the foregoing, the parties respectfully request that this Court approve and enter the proposed Agreed Protective Order, which will be submitted for the Court's consideration via email

Respectfully submitted,

s/ Jeffrey C. Hendrickson

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